IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

Plaintiff, V. Case No.: 4:14-CV-02345 ANDREW I. FARMER, CHARLES E. GROB, JR., CAROLYN AUSTIN, BALDEMAR P. RIOS, and CHIMERA ENERGY CORP. Defendants. Defendants.	SECURITIES AND EXCHANGE COMMISSION,	§	
ANDREW I. FARMER, CHARLES E. GROB, JR., CAROLYN AUSTIN, BALDEMAR P. RIOS, and CHIMERA ENERGY CORP. §	Plaintiff,	8	
CHARLES E. GROB, JR., CAROLYN AUSTIN, BALDEMAR P. RIOS, and CHIMERA ENERGY CORP. §	v.	§	Case No.: 4:14-CV-02345
CHARLES E. GROB, JR., CAROLYN AUSTIN, BALDEMAR P. RIOS, and CHIMERA ENERGY CORP. §		§	
CAROLYN AUSTIN, BALDEMAR P. RIOS, and CHIMERA ENERGY CORP. §	ANDREW I. FARMER,	§	
BALDEMAR P. RIOS, and § CHIMERA ENERGY CORP. §	CHARLES E. GROB, JR.,	§	
CHIMERA ENERGY CORP. § §	CAROLYN AUSTIN,	§	
§	BALDEMAR P. RIOS, and	§	
Defendants. § §	CHIMERA ENERGY CORP.	§	
Defendants. § §		§	
§	Defendants.	§	
		§	

DECLARATION OF NIKOLAY V. VYDASHENKO IN SUPPORT OF PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S OPPOSITION TO RENEWED MOTION TO VACATE

- 1. I am an attorney in the Division of Enforcement of the Securities and Exchange Commission (the "Commission").
- 2. I submit this declaration in support of the Commission's Opposition to Defendant Andrew I. Farmer's Renewed Motion to Vacate the Court's October 7, 2015 Order granting the Commission summary judgment. This declaration is based on my personal knowledge and the statements in this declaration are made to the best of my knowledge.
- 3. The Commission made document productions to Farmer's counsel on March 9, 2015, June 3, 2015, and July 7, 2015. As part of these productions, the Commission produced to Farmer's counsel documents it received from Thomas Massey in the course of its investigation (the "Massey Documents").

4. The Commission produced the Massey Documents to Farmer's counsel in the

same format as the Commission received them from Massey. Thus, those Massey Documents

that did not contain metadata were produced to Farmer's counsel also without metadata.

5. Attached as Exhibits A, B, and C are true and correct copies of certain of the

Massey Documents that the Commission obtained from Massey and produced to Farmer's

counsel as described in Paragraph 3 of this declaration.

6. Attached hereto as Exhibit D is a true and correct copy of the transcript of the

August 8, 2016 deposition of Charles Grob.

7. Attached hereto as Exhibit E are true and correct copies of certain documents

produced to the Commission and to Farmer's counsel by the U.S. Attorney's Office for the

Southern District of Texas.

8. Attached hereto as Exhibit F is a true and correct copy of the subpoena the

Commission served on Farmer on December 5, 2012.

9. Attached hereto as Exhibit G is a true and correct copy of excerpts from the

transcript of the July 17, 2015 deposition of Andrew I. Farmer.

10. Attached hereto as Exhibit H is a true and correct copy of Plaintiff's First Request

for Production of Documents to Defendant Andrew I. Farmer, which the Commission served on

Farmer in this action.

11. I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 18th day of January, 2017.

Nikolay V Vydashenko